

IN THE UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF MISSOURI

IN RE: )  
)  
INTERSTATE UNDERGROUND WAREHOUSE )  
AND INDUSTRIAL PARK, INC. ) Case. No. 21-40834  
) Chapter 11  
Debtor. )

**OBJECTION TO CLAIM**

Comes now Movant Interstate Underground Warehouse and Industrial Park, Inc., and hereby objects to the Proof of Claim filed by creditor, Robert Taylor, in the amount of \$100,000.00, and filed on October 27, 2021. The court claim number is 16.

**Your claim may be reduced, modified, or eliminated. You should read this document carefully and discuss it with your attorney, if you have one.**

Pursuant to Local Rule 3007-1 (C), the Claimant shall have 30 days after service of the Objection in which to file a Response, if you do not want the court to eliminate or change your claim. The Response shall be in writing and state why the claim should be allowed as filed. If a Response is filed, the Court will schedule a hearing. If no timely Response is filed, the Court will enter an Order sustaining the Objection to the Claim. Parties not represented by an attorney shall mail a Response to the Court at **U.S. Bankruptcy Court, 400 E. 9<sup>th</sup> St., Room 1510, Kansas City, MO 64106**. Debtor(s) not represented by an attorney must be served a copy of the Response by regular mail. If your Response is mailed, it must be early enough so that the court will receive it on or before 30 days after service of the Objection.

The basis for the objection is as follows: (PLEASE CHECK ONLY THE APPLICABLE BOXES)

☒ The claim should be disallowed entirely because:

- (a) There was no proof attached to the Proof of Claim that Claimant owned a 1956 Porsche VIN xx56722. The documentation attached to the Proof of Claim does not evidence a VIN or ownership of a 1956 Porsche. There is no evidence that a 1956 Porsche was stolen from the Debtor's premises. The Jackson County personal property tax declarations do not reflect that Robert Taylor ever owned a 1956 Porsche. While the Jackson County personal property tax declarations from 2001 to present do reflect ownership of other Porsche vehicles, it does not reflect a 1956 Porsche.

(b) When Leslie Reeder came to Kansas City to take over management of the Debtor, she discovered a shell of a Porsche that was stripped and did not have a VIN number on it. It appeared to have been torched, was missing tires, windows, front and back hoods. The vehicle did not have any indication that it was owned by Claimant. The vehicle was mistakenly determined to have been abandoned by a former tenant and it was towed by Class Act Towing. Class Act Towing made some repairs/restoration and sold the shell to Dennis Collins with Collins Brothers Jeep in Wylie, Texas for \$3,500. Subsequently, Movant discovered that Claimant located the vehicle at Collins Brothers Jeep in Texas. Movant also learned that Claimant contacted Collins Brothers Jeep and retrieved the vehicle. Thus, Claimant has been made whole by the return of the vehicle after time and materials were invested in its restoration.

Dated: 1/18/2022

KRIGEL & KRIGEL, P.C.

/s/ Erlene W. Krigel  
Erlene W. Krigel, MO #29416  
4520 Main St., Ste. 700  
Kansas City, MO 64111  
Telephone: (816) 756-5800  
Fax: (816) 756-1999  
Email: [ekrigel@krigelandkrigel.com](mailto:ekrigel@krigelandkrigel.com)  
ATTORNEYS FOR DEBTOR

### **CERTIFICATE OF SERVICE**

I, Erlene Krigel, hereby certify that a true and correct copy of the Objection to Claim was mailed to Robert Taylor, by first class mail this 18th day of January, 2022,

Robert Taylor  
118 W. 52th Street  
Kansas City, MO 64112

And all other parties in interest and creditors who receive notice electronically via the Court's Electronic System.

/s/ Erlene W. Krigel  
Erlene W. Krigel

**Court address: U.S. Bankruptcy Court, 400 E. 9th St., Room 1510, Kansas City, MO 64106**

**Instructions: Complete all parts of the form and serve on the affected parties**

ECF Event: Bankruptcy>Claim Actions>Objection to Claim (includes 30-day notice)